

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Post Office Structure Plan

Docket No. N2012-2

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS JEFFREY C. DAY
(APWU/USPS-T1-12-15)
(June 28, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Jeffrey C. Day (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Jeffrey C. Day (APWU/USPS-T1-1-11), filed on June 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-12 Based on Figure 2 of your testimony, the Average Retail Hours per Week are well matched to the Average Earned Workload Hours per week for Levels 15 and 16 Post Offices. What is the purpose of including those offices in the plan?

APWU/USPS-T1-13 Based on your testimony at pages 10 and 13 there appears to be two reasons for an office to be upgraded from an EAS level 16 or below to an EAS Level 18 or above office. One way is for an office to have 5.74 hours of Adjusted Earned Workload and another is for an office to be upgraded because there is no other EAS Level 18 or above to serve as an APO for a particular cluster of post offices. Please confirm that upgrades presented in Figure 7 are all being undertaken due to the first reason.

APWU/USPS-T1-14 Library Reference USPS-LR-N2012-2/6 indicates that upgrading offices that are currently EAS Levels 15 and 16 offices to EAS Level 18 offices will cost the Postal Service approximately 10-20 percent more for essentially the same level of service. What is the rationale for that?

APWU/USPS-T1-15 The timeline on page 22 of your testimony indicates that upgrades of Post Offices will be completed in June 2012. How many upgrades does the Postal Service anticipate will take place in the POSTPlan offices by June 30, 2012?